

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709
SKYLER H. PEARSON
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
702-388-6336
skyler.pearson@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MITCHELL JENKINS,

Defendant.

2:24-cv-00346-JCM-EJY

**Stipulation to Extend Time to File the
United States' Answering Brief**

(Fourth Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Skyler H. Pearson, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen, Assistant Federal Public Defender, counsel for Mitchell Jenkins, request that the due date for the United States' answering brief be extended an additional sixty (60) days, until **January 10, 2025**.

This stipulation is entered into for the following reasons:

1. This case involves an appeal from a bench trial in which Mr. Jenkins was convicted of one count of resisting arrest, a violation of 43 C.F.R. § 8365.1-4(a)(4).

2. The parties disagreed about the proper interpretation of the regulation, for which there is little governing caselaw, and the sufficiency of the evidence presented at trial.

1 3. Given the relative complexity of the appeal, and that the undersigned recently joined
2 the criminal division and was recently assigned this and other matters, the parties agree that
3 additional time is warranted to allow for review of the record, research of the issues, and
4 preparation of the answering brief.

5 4. The defendant is out of custody and does not oppose the continuance.

6 This is the fourth request to extend this deadline.

7 Respectfully submitted this 6th day of November 2024.

8
9 /s/ Skyler H. Pearson

10 Skyler H. Pearson, Esq.

11 Assistant United States Attorney

/s/ Joy Chen

12 Joy Chen

13 Assistant Federal Public Defender
14
15
16
17
18
19
20
21
22
23
24

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

2:24-cv-00346-JCM-EJY

4 Plaintiff,

ORDER

5 v.

6 MITCHELL JENKINS,

7 Defendant.

8 IT IS THEREFORE ORDERED that upon consideration of the United States' request to
9 extend time to file an answering brief, that the United States' deadline to file its answering brief is
10 extended to **January 10, 2025**.

11
12 Dates this 7th day of November, 2024

13
14 
15 UNITED STATES MAGISTRATE JUDGE
16
17
18
19
20
21
22
23
24